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Before the
Federal Communications Commission
Washington D.C. 20554

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In the Matter of) MM Docket 94-77
) RM-8470
Amendment of Section 73.202(b))
Table of Allotments,)
FM Broadcast Stations,)
(Shasta Lake City,)
California).)

TO: Chief, Allocations Branch,
Policy and Rules Division,
Mass Media Bureau.

COMMENTS of COREY J. McCASLIN

The Commission is considering a proposal by Mark C. Allen ("Allen"), requesting the allocation of Channel 276A to Shasta Lake City, California. The Federal Register citation (59 FR 36736) indicated that this request was the first local aural transmission service for this community, however this is not correct. Radio Station KNNN(FM), Channel 257C3 is presently allocated to Lake Shasta City, as the community of Central Valley, California was annexed (along with two other communities) when Lake Shasta City incorporated on 2 July 1993. Therefore, this request is to establish a second local aural service.

I oppose the allocation of Channel 276A to Lake Shasta City, and present a counterproposal to allocate Channel 276C2 to Weaverville, California. Further I request that Channel 224A be allocated to Lake Shasta City in lieu of Channel 276A as requested by Allen, as an allocation of 276C2 at Weaverville would be mutually exclusive to the allotment of Channel 276A at Lake Shasta City.

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In support of the counterproposal for Channel 276C2, and the request to allocate Channel 224A in lieu of Channel 276A, I will demonstrate that not only are both of these allocations technically possible, but also preferable using the Commission's Allocations Priorities. Furthermore, it is my intent to apply for Channel 276C2 at Weaverville, if allotted.

COUNTERPROPOSAL-ALLOCATE CHANNEL 276C2 TO WEAVERVILLE, CA.

In comparing competing FM Allotment proposals, the Commission has determined that the priorities are:

1. First Aural Service.
2. Second Aural Service.
3. First Local Service.
4. Other Public Interest Matters.

(Co-equal weight is given to priorities (2) and (3).) (90 FCC Rcd 88 (1982)).

An allotment to Lake Shasta City constitutes a priority (4), given the fact that such an allocation would result in a **second aural service** to that community.

Weaverville, California is the county seat for Trinity County. Allocation of Channel 276C2 to Weaverville would constitute a priority (3), as there are **no other aural services** allotted to that community. Infact, there are **no other Broadcast Allocations (AM, FM, or TV)** to any community in Trinity County.

In addition, an allotment of Channel 276C2 to Weaverville is a more efficient use of the FM spectrum, as a Class C2 FM Station provides a wider service area than that of a Class A FM Station. Attached is **EXHIBIT 1**, which demonstrates that Channel 276C2 can be allotted to Weaverville, California at a site 10 km Northeast of Weaverville.

ALLOTMENT OF CHANNEL 224A IN LIEU OF CHANNEL 276A AT LAKE SHASTA CITY, CALIFORNIA, AS REQUESTED BY ALLEN.

Firstly, the counterproposal to allot Channel 276C2 to Weaverville, California precludes an allotment of Channel 276A to Lake Shasta City, California.

However, Channel 224A is able to be allocated to Lake Shasta City (resolving the conflict with the counterproposal) using a reference site just 1.53 km (0.9 miles) Southwest of Allen's reference site for Channel 276A. Furthermore, Channel 224A is **less restrictive** than Channel 276A in selecting a fully spaced FM Transmitter site. Radio Station KZAP(FM), Channel 272C2, Red Bluff, California precludes locating a fully spaced FM Transmitter site on Channel 276A at any location South of Allen's reference site (i.e. a site closer to Lake Shasta City).

Attached is **EXHIBIT 2** which demonstrates that Channel 224A can be allotted to Lake Shasta City, California at a site 4 km Northwest of Lake Shasta City.

CONCLUSION.

The counterproposal to Allocate Channel 276C2 to Weaverville, California rather than Channel 276A to Lake Shasta City, California represents a preferential Allotment using the Commission's own set of **ALLOTMENT PRIORITIES**. Furthermore, the Public Interest is advanced by such an Allocation as there are presently **no other aural services Allocated in all of Trinity County** where Weaverville is located.

Channel 224A can be Allocated to Lake Shasta City, California in lieu of Channel 276A removing any conflict with the counterproposal to Allocate 276C2 to Weaverville, California. Infact, the Allotment of Channel 224A to Lake Shasta City is less restrictive in the location of a fully spaced FM Transmitter site to serve Lake Shasta City as compared to Channel 276A.

Therefore, I request that the Commission accept my counterproposal to Allot Channel 276C2 to Weaverville, California, and request that Channel 224A be Allocated to Lake Shasta City, in lieu of the proposal by Allen to Allocate Channel 276A to that community.

The data and statements contained herein are accurate to the best of my knowledge.

Respectfully submitted,

DATE: 9-2-94
P.O. Box 8622,
Chico, California 95927.


Corey D. McCaslin

CERTIFICATE OF SERVICE

I, Corey J. McCaslin, do hereby certify that a copy of the foregoing COMMENTS OF COREY J. McCASLIN regarding MM Docket No. 94-77, RM-8470, has been sent via first-class mail, postage pre-paid, this 2 nd day of September, 1994 to the following person:

Mr. Mark C. Allen (Petitioner)
3745 McHale Way,
Redding, CA. 96001



Corey J. McCaslin.

EXHIBIT 1**COMMENTS OF COREY J. McCASLIN
MM DOCKET No. 94-77.**

Co-channel, Adjacent Channel, and I.F. Spacing for FM Channel
276C2 at Weaverville, California.

Reference Coordinates: 40-49-32, 122-55-21.

CALL SIGN CITY OF LICENSE	CHANNEL FREQ.(MHZ)	REQUIRED DISTANCE(km)	ACTUAL DISTANCE(km)
KRED Eureka, CA.	222C1 92.3	27	89.5
KLAD Klamath Falls, OR.	223C 92.5	35	177.7
KSFM Woodland, CA.	273B 102.5	74	268.7
KZAP Red Bluff, CA.	274C2 102.7	58	94.6
NEW Bonanza, OR.	275A 102.9	106	187.3
KUKI Ukiah, CA.	277B 103.3	169	169
KHSL-FM Paradise, CA.	278B1 103.5	56	140.7
KEWO Gaberville, CA.	279C1 103.7	79	102
PRM-(KWEO) Hydesville, CA.	279C1 103.7	79	117.4

EXHIBIT 2.**COMMENTS OF COREY J. McCASLIN
MM DOCKET No. 94-77.**

Co-channel, Adjacent Channel, and I.F. Spacing for FM Channel
224A at Lake Shasta City, California.

Reference Coordinates: 40-43-11, 122-22-20.

CALL SIGN CITY OF LICENSE	CHANNEL FREQ. (MHZ)	REQUIRED DISTANCE (km)	ACTUAL DISTANCE (km)
KRED Eureka, CA.	222C1 92.3	75	135.3
KLAD Klamath Falls, OR.	223C 92.5	165	165
KLRS Chico, CA.	224A 92.7	115	119.6
KLCQ Healdsburg, CA.	225B 92.9	113	221
KXGO Arcata, CA.	226C 93.1	95	135.2
KJDX Susanville, CA.	227C 93.3	95	155.4
KUKI Ukiah, CA.	277B 103.3	15	172.6
KHSL-FM Paradise, CA.	278B1 103.5	12	101.4